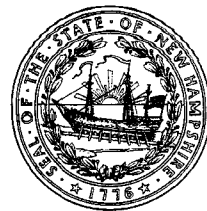




The State of New Hampshire  
*Department of Environmental Services*



Michael P. Nolin  
Commissioner

**LETTER OF DEFICIENCY**  
**WD WWEB/C 06-008**

June 2, 2006

Byron L. Young  
Safety & Environmental Management  
US Army Engineer Research & Development Center CEERD-SO  
72 Lyme Road  
Hanover, New Hampshire 03755

Subject: National Pollutant Discharge Elimination System (NPDES) Compliance  
Inspection at US Army Engineer Research & Development Center  
CEERD-SO, Hanover, NH – NPDES Permit #NH0001619

Dear Mr. Young:

On May 24, 2006, as a representative of the Department of Environmental Services (DES) Wastewater Engineering Bureau, Roy D. Gilbreth conducted an NPDES Compliance Evaluation Inspection (CEI) at US Army Engineer Research & Development Center (CEERD-SO). Objectives of a CEI included determining compliance with NPDES permit conditions, verifying the accuracy of permit-required information and verifying the adequacy of permittee sampling and monitoring.

The following people were present during this CEI:

Byron L. Young, Safety & Environmental Management, CEERD-SO  
Tony Wood, Refrigeration Mechanic, CEERD-SO  
Roy D. Gilbreth, Environmental Inspector, DES

**DEFICIENCIES: (response required)**

During the inspection the following deficiencies were noted:

1. The logbook for pH and temperature sampling does not include the test method for either laboratory procedure. The pH and temperature test method numbers must be included on bench sheets or in your logbook.

2. Failure to maintain written documentation that the thermometer in the pH meter is checked against an in-house NIST-certified thermometer. Written documentation must be provided, and if the temperature of the pH meter thermometer is different from the NIST-certified thermometer, the correction factor must be attached to the pH meter so temperature corrections may be made when testing.
3. April, May, June, July, August and September 2005 DMRs were not received at DES until October 25, 2005, 152 days to 10 days late. Since this time, all DMRs have been received on time at DES as required in Part I, B of your NPDES permit.
4. DMRs have contained periodic errors including reporting boxes not completed, the name of the person performing laboratory analyses not provided, and not providing a reason for effluent violations. All DMR errors have been corrected, and the DMRs have shown significant improvement over the past few months. As CEERD-SO officials are certifying that the DMR information is true, accurate and complete, more attention must be paid to the accuracy of this reporting information.
5. CEERD-SO did not notify DES or EPA verbally or in writing concerning an effluent pH violation in January 2006. Pursuant to Part II, Section D.1.e. of your NPDES permit, all noncompliance that may endanger health or the environment shall be reported orally within 24 hours of becoming aware of the circumstances and written notification submitted within five days.

**REPEAT DEFICIENCIES noted in April 18, 2003 Inspection: (Response required)**  
**- If these repeat deficiencies are noted in any subsequent inspection DES may proceed immediately with formal enforcement action which may include an administrative fine.**

1. The logbook for pH and temperature sampling must include the sample type (grab), sampler and analyst.
2. The pH meter must be checked with a mid-point buffer (between 7 and 10 su) as a quality control check after pH meter two-point calibration.

**CORRECTIVE ACTIONS REQUIRED:**

DES requests that CEERD-SO describe all steps taken to correct the deficiencies identified by the inspector. This description should also include the dates the deficiencies were corrected or the anticipated correction date. When the response is complete, you, Byron Yound, as the **responsible official** for this facility must sign the response submittal to DES. If the submitted response is acceptable to DES and the deficiencies are not repeat deficiencies and/or have not resulted in environmental harm, we will close out the inspection and no further action, other than continued compliance, will be required.

June 2, 2006

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If DES identifies repeat deficiencies or deficiencies that result in environmental harm in this or future inspections, DES may proceed immediately with enforcement.

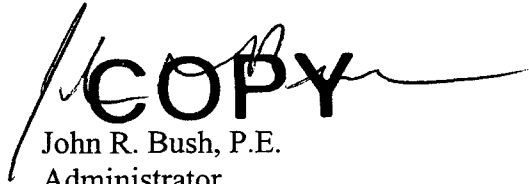
DES requests that you submit your response to this inspection by **July 10, 2006**. If DES does not receive a complete response signed by the appropriate official within the allowed time frame, DES may proceed with an appropriate enforcement action.

Please mail your inspection response to:

Roy D. Gilbreth  
NHDES/WD-WWEB  
P.O. Box 95  
Concord, NH 03302-0095

Enclosed is a copy of EPA Form 3560 – Water Compliance Inspection Report. If you have any questions, please call Roy D. Gilbreth at 271-1494.

Sincerely,

 **COPY**  
John R. Bush, P.E.  
Administrator

Wastewater Engineering Bureau

cc: DES, WD, WWEB/File  
Roy D. Gilbreth, Environmental Inspector, WWEB  
Margaret Bastien, P.E., WWEB  
Gretchen Hamel, Enforcement/Coordinator DES  
Joy Hilton, USEPA Water Technical Unit

Attachment: EPA Form 3560 – Water Compliance Inspection Report

CERTIFIED MAIL/RRR: 7099 3400 0018 1294 3677